



U.S. Department of Justice

*United States Attorney  
Southern District of New York*

*The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278*

March 20, 2025

**BY ECF**

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Michelle Bond*, 24 Cr. 494 (GBD)**

Dear Judge Daniels:

By order dated March 20, 2025, the Court adjourned defendant Michelle Bond's substantive motion deadline to May 4, 2025. (Dkt. 31). However, May 4 is a Sunday. The Government has conferred with defense counsel, and the parties jointly and respectfully request that Bond's motion deadline be adjourned to the following day—Monday, May 5, 2025—and that the other dates in the briefing schedule be adjusted accordingly, with the Government's opposition due on June 5, 2025, and Bond's reply due on June 19, 2025.

In addition, the Court had previously set a status conference in this matter for June 10, 2025, to include argument on Bond's motions if necessary. Given the adjournment of the motion deadline, the parties also request a proportional adjournment of the status conference by approximately one month. If that request is granted, the Government respectfully requests, with the consent of defense counsel, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), through the new status conference date. The Government respectfully submits that an exclusion of time would serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial because it would allow the parties to begin to continue to produce and review discovery, to consider and engage in motion practice, and to engage in discussions regarding a potential resolution of the matter without the need for trial.

Respectfully submitted,

MATTHEW PODOLSKY  
Acting United States Attorney  
Southern District of New York

By: \_\_\_\_\_/s/  
Stephanie Simon  
Assistant United States Attorney

cc: All counsel of record (by ECF)